

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BEARBOX LLC and AUSTIN STORMS,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 21-534-MN-CJB
)	
LANCIUM LLC, MICHAEL T.)	REDACTED VERSION
MCNAMARA, and RAYMOND E. CLINE,)	
JR.)	
)	
Defendants.)	

**DECLARATION OF ADAM M. KAUFMANN IN SUPPORT OF
DEFENDANTS’ REPLY BRIEF IN SUPPORT OF THEIR
MOTION FOR SUMMARY JUDGMENT REGARDING DAMAGES
AND MOTION TO EXCLUDE OPINIONS OF DAVID DUSKI**

I, Adam M. Kaufmann, under the penalties for perjury states:

1. I have personal knowledge of the facts set forth in this Declaration; I am competent to testify as to all matters stated in this Declaration; and, I am not under any legal disability that would preclude me from testifying. If called upon to do so, I would testify to the facts set forth in this Declaration.

2. I am a partner at the law firm Barnes & Thornburg LLP, counsel of record for Defendants Lancium LLC, Michael T. McNamara, and Raymond E. Cline, Jr. (collectively, “Defendants”) in the above-captioned case. I am licensed in the State of Illinois and admitted *pro hac vice* to practice before this Court. I submit this declaration in support of Defendants’ Motion for Summary Judgment.

3. Attached to this Declaration as Exhibit 43 is a true and correct copy of excerpts from the June 3, 2022 deposition of Stanley McClellan.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: July 29, 2022

A handwritten signature in blue ink, appearing to read 'Adam Kaufmann', is written above a horizontal line.

Adam Kaufmann